

TRANSMITTAL

This transmits the Draft South Lewis County Subarea Plan and the Draft Environmental Impact Statement (DEIS). Adoption of the Subarea Plan is a non-project action which will amend the Lewis County Comprehensive Plan, adding a more detailed level of land use, housing transportation, capital facilities and environmental protection policies aimed at increasing the economic development potential of the South County while complying with the goals of the Growth Management Act. The DEIS identifies potential significantly adverse impacts of the alternatives considered in the subarea planning process and the associated mitigating measures.

The DEIS is being distributed for compliance with the State Environmental Policy Act of 1971, RCW 43.21C. Comments are invited between the release date and the close of the comment period August 24, 2010 to October 8, 2010.

Written comments should be directed to:

Barbara Kincaid

Attn: Draft South Lewis County Subarea Plan and/or Draft Environmental Impact Statement
Lewis County Department of Community Development

2025 NE Kresky Avenue

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The Lewis County Planning Commission will hold public meetings and one public hearing during the DEIS comment period on August 24, 2010, September 14, 2010, and September 28, 2010 to receive public comment to prepare a Final Environmental Impact statement which will include a recommended preferred alternative. All meetings will begin at 7:00 pm at the Lewis County Courthouse in Chehalis, Washington. The Commission's recommendation will be transmitted to the Board of County Commissioners for a public hearing and action anticipated to occur October 25, 2010.

Any questions regarding this process should be directed to Barbara Kincaid, Lewis County Planning at (360) 740-1389.

Thank you for your consideration.

Barbara Kincaid, Senior Planner

Lewis County Community Development

South Lewis County, Washington

DRAFT SUBAREA PLAN AND ENVIRONMENTAL IMPACT STATEMENT

August 24, 2010

*Lewis County
Department of Community Development
2025 NE Kresky Avenue
Chehalis, Washington 98532*

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DRAFT SOUTH COUNTY SUBAREA EIS

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FACT SHEET

Per WAC 197-11-440 (2), the following is included in the Environmental Impact Statement:

Project Title: Environmental Impact Statement of the South Lewis County Subarea Plan

This document is a Draft Environmental Impact Statement (DEIS) covering the impacts of anticipated County adoption of a plans, policies, regulations, and capital facilities investments into the Lewis County Comprehensive Plan based on the process conducted by the South Lewis County Subarea Steering Committee.

Description of Proposal: The proposed action involves the adoption of a Subarea Plan as an element of the Comprehensive Plan and related amendments to the Lewis County Code. The potential environmental impacts of designating economic development urban growth areas, as proposed by the South Lewis County Subarea Steering Committee, as well as the No-Action Alternative and other growth alternatives are identified and assessed in this document. Current adopted and possible additional mitigation measures associated with the impacts are also identified.

Proponent: Lewis County

Date for Implementation: December, 2010 (proposed)

Lead Agency:

Lewis County Department of Community Development
Robert Johnson, Director
2025 NE Kresky Avenue
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SEPA Responsible Official: Phillip Rupp, Principal Planner

Contact Person: Barbara Kincaid, Senior Planner

Permits & Approvals Required: Recommendations by the Lewis County Planning Commission and subsequent Board of County Commissioners adoption of the subarea plan.

Authors and Principal Contributors:

The following are agencies and bodies who were either reviewers or principal contributors to the preparation of the EIS:

- Lewis County Department of Community Development
- South Lewis County Subarea Steering Committee
- BHC Consultants, LLC.
- Cook Engineering and Development Services
- Perteet Engineering
- Washington State Department of Ecology
- Washington State Department of Fish and Wildlife

Date of Issuance: August 24, 2010

Date of Notice: September 8, 2010

Comments on DEIS: Comments on the DEIS may be submitted in writing or in person during the public meetings. Written comments should be submitted to:

Lewis County Department of Community Development
Barbara Kincaid, Senior Regional Planner
2025 NE Kresky Avenue
Chehalis, WA 98532
Email: barbara.kincaid@lewiscountywa.gov

Comments Due: October 8, 2010

Public Meetings: August 24, September 14, September 28, 2010 Planning Commission

Location of Review Copies of Proposal/Background Material:

Available online at:

<http://lewiscountywa.gov/communitydevelopment/communitydevelopment-south-county-subarea-plan>

Also available at: The Lewis County Planning Department, Timberland Regional libraries 5) located at: Chehalis, Centralia, Salkum, Randle, and Winlock, and Lewis County Senior Centers (5) located at: Morton, Toledo, Twin Cities (Chehalis), Packwood, and Winlock

Final Action Date: December, 2010

Subsequent Review: This is a phased environmental review process in accordance with WAC 197-11-060(5). Following adoption of the South Lewis County Subarea Plan, future SEPA review will be required for project actions taken to implement the plan along with private proposals for development that exceed exemption thresholds set forth in WAC 197-11-800. Lewis County retains authority to impose site-specific mitigation measures to address potential significant adverse environmental impacts.

Prior EIS: The Comprehensive Plan EIS and all supplements are adopted by reference.

Cost to Public: Information is available to the public upon request. Hard copies are available at a rate of \$0.25/page for each document. Most information is also available online for free at the website.

I. INTRODUCTION AND SUMMARY

Lewis County has drafted the South County Subarea Plan to increase economic development opportunities and manage the county's future growth. Washington's State Environmental Policy Act (SEPA) classifies the adoption of a comprehensive (subarea) plan as a "non-project action;" that is, it addresses policies, plans, or programs rather than site-specific projects. For non-project actions, SEPA requires an environmental impact statement (EIS) that evaluates possible impacts of the proposed action as well as impacts of alternatives to the action. This is also known as "phased review" in that the general level of review possible for a plan sets the stage for the more detailed review done during the development permit review and approval process.

Background

In 1990, the Washington State Legislature, intending to encourage economic prosperity and balanced economic growth throughout the state, found that while the Puget Sound region was experiencing economic prosperity and the challenges associated with rapid growth, much of the rest of the state was not experiencing economic prosperity and faced challenges associated with slow economic growth.

The Washington State Growth Management Act (GMA) states that to accomplish economic growth throughout the whole state: "Growth must be managed more effectively in the Puget Sound region and rural areas must build local capacity to accommodate additional economic activity in their communities. Where possible, economies and low income areas should be linked with prosperous urban economies to share economic growth for the benefit of all areas of the state."

The act further states, "to accomplish this goal, it is the intent of this legislature to insure equitable opportunities to secure prosperity for distressed areas, rural communities, and disadvantaged populations by promoting urban/rural economic links and by promoting value-added product development, business networks, and increased exports from rural areas."

RCW 36.70A.115 further states: "Counties and cities that are required or choose to plan under RCW 36.70A.040 shall ensure that, taken collectively, adoption of and amendments to their comprehensive plans and/or development regulations provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and employment growth, including the accommodation of, as appropriate, the medical, governmental, educational, institutional, commercial, and industrial facilities related to such growth, as adopted in the applicable countywide planning policies and consistent with the twenty-year population forecast from the office of financial management."

Lewis County planning policies are very similar to the state's economic development policy and endeavor to: "Encourage economic development throughout Lewis County that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens, especially for unemployed and disadvantaged persons, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities."

In 1997, the Lewis County Economic Development Council retained E.D. Hovee & Company to analyze the long term industrial land needs of the county. Through adoption of several policies aimed at reversing 25 years of adverse economic conditions, the study concluded that Lewis County would need approximately 2,400 additional gross acres of industrial land by the end of the planning period in 2017.

The Hovee study was updated in 2005. The 2005 update concluded that “Lewis County does not have a readily available supply of industrial property free and clear of environmental constraints to meet market demands over the next 20 years. With only 450 acres available and free of environmental constraints, Lewis County is short 420+ acres under *historic trend* demand forecasts and short as much as 2,580 acres with the *economic emphasis* alternative. Even if half of the property that has only some wetland or flood plain constraints could be readied for development, Lewis County would be still short of industrial land under either forecast scenario.”

The Lewis County Board of Commissioners authorized the formation of the South Lewis County Subarea Steering Committee in 2009, charged with working with County staff and consultants to conduct a public outreach process leading to a Subarea Plan. The South County Subarea Plan is intended to fulfill the Comprehensive Plan objectives of directing growth to urban areas within the County while creating opportunities for sustainable economic development. The 2010 Draft Subarea Plan and DEIS is based on the Committee’s work through the process.

In 2010 the State legislature amended the Growth Management Act to authorize cities and counties to prepare and adopt, at any time, “*an initial subarea plan for economic development located outside the one hundred year floodplain in a county that has completed a state-funded pilot project that is based on watershed characterization and local habitat assessment.*” The South County Subarea Plan satisfies these criteria.

The Proposed Action

Currently, most of Lewis County’s economic development land use activity is located in the northwest portion of the county. The South County Subarea Plan has been drafted to provide opportunities for economic growth and development in South County as envisioned by the Steering Committee. The vision statement speaks to achieving the economic development goal while limiting rural sprawl; reducing the pressure on conversion of natural resource lands; and preserving the rural character of the area that is important to the local quality of life.

Designating economic-development urban growth areas for industrial, regional commercial and tourist-oriented development emerged as part of the long-term strategy for achieving the vision.

Lewis County and the cities of Toledo, Winlock and Vader are also considering approaches to providing regional water and sanitary sewer utility services to the urban areas in South County. This process is linked to the Subarea Plan, but has a different timeline due to the governance options that are being considered. As a result, the Subarea Plan includes a conceptual policy framework for these public services and facilities, but further environmental review will be required as the actual functional planning is being done.

Existing Situation

South County is dominated by rural and resource lands. Of the total of approximately 68,000 acres within the planning area, approximately 21,700 acres are designated as Agricultural Resource Lands, Forest Resource Lands, Mining and Park. Approximately 42,400 acres are designated as rural lands including Limited Areas of More Intensive Rural Development (LAMIRDs) under the provisions of the GMA and the Lewis County Comprehensive Plan. The remaining approximately 3,900 acres are urban growth areas (UGAs) including both incorporated cities and adjacent unincorporated urban areas. The cities of Toledo, Winlock and Vader have adopted comprehensive plans for accommodating 20 years' of anticipated growth. In concert with these plans, the Subarea Plan identifies further lands for urban development to support the vision and market demand for economic development.

Scoping

In April, 2010, Lewis County *"determined this (Subarea Plan) proposal is likely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c) and will be prepared."* The "Determination of Significance" (DS) was issued April 14, 2010. A SEPA checklist was not prepared – instead the County used analysis documented in the Subarea plan process to make the determination. The scoping period closed April 30, 2010.

Elements of the Environment

The State Environmental Policy Act (SEPA) defines elements of the environment as follows:

- (1) *Natural environment*
 - a. *Earth*
 - (i) *Geology*
 - (ii) *Soils*
 - (iii) *Topography*
 - (iv) *Unique physical features*
 - (v) *Erosion/enlargement of land area (accretion)*
 - b. *Air*
 - (i) *Air quality*
 - (ii) *Odor*
 - (iii) *Climate*
 - c. *Water*
 - (i) *Surface water movement/quantity/quality*
 - (ii) *Runoff/absorption*
 - (iii) *Floods*
 - (iv) *Ground water movement/quantity/quality*
 - (v) *Public water supplies*
 - d. *Plants and animals*
 - (i) *Habitat for and numbers of diversity of species of plants, fish, or other wildlife*
 - (ii) *Unique species*
 - (iii) *Fish and wildlife migration routes*
 - e. *Energy and natural resources*

- (i) *Amount required/rate of use/efficiency*
 - (ii) *Source/availability*
 - (iii) *Nonrenewable resources*
 - (iv) *Conservation and renewable resources*
 - (v) *Scenic resources*
- (2) *Built Environment*
- a. *Environmental health*
 - (i) *Noise*
 - (ii) *Risk of explosion*
 - (iii) *Releases or potential releases to the environment affecting public health, such as toxic or hazardous materials*
 - b. *Land and shoreline use*
 - (i) *Relationship to existing land use plans and to estimated population*
 - (ii) *Housing*
 - (iii) *Lights and glare*
 - (iv) *Aesthetics*
 - (v) *Recreation*
 - (vi) *Historic and cultural preservation*
 - (vii) *Agricultural crop*
 - c. *Transportation*
 - (i) *Transportation systems*
 - (ii) *Vehicular traffic*
 - (iii) *Waterborne, rail, and air traffic*
 - (iv) *Parking*
 - (v) *Movement/circulation of people or goods*
 - (vi) *Traffic hazards*
 - d. *Public services and utilities*
 - (i) *Fire*
 - (ii) *Police*
 - (iii) *Schools*
 - (iv) *Parks or other recreational facilities*
 - (v) *Maintenance*
 - (vi) *Communications*
 - (vii) *Water/storm water*
 - (viii) *Sewer/solid waste*
 - (ix) *Other governmental services or utilities*
- (3) *To simplify the EIS format, reduce paperwork and duplication, improve readability, and focus on the significant issues, some or all of the elements of the environment in WAC 197-11-444 may be combined.*

The County's DS identified the "potential areas for discussion in the EIS" as: earth, water, plants and animals, energy and natural resources, environmental health, land and shoreline use, transportation, and public services and utilities.

Public Scoping Comments

While most of the comments related to the draft Subarea plan itself, not on environmental impacts, there were comments on the relationship between land development and

transportation; the link between job creation and housing; impacts of extending urban utilities into rural areas; and mitigation of impacts associated with urban level development.

EIS Coverage

The Subarea Plan Draft EIS will address the environmental impacts of the Board of County Commissioners' action to adopt the Subarea Plan as an element (chapter) of the Lewis County Comprehensive Plan. This is a "programmatic," or non-project, action as defined in WAC 197-11-442.

(1) The lead agency shall have more flexibility in preparing EISs on nonproject proposals, because there is normally less detailed information available on their environmental impacts and on any subsequent project proposals. The EIS may be combined with other planning documents.

(2) The lead agency shall discuss impacts and alternatives in the level of detail appropriate to the scope of the nonproject proposal and to the level of planning for the proposal. Alternatives should be emphasized. In particular, agencies are encouraged to describe the proposal in terms of alternative means of accomplishing a stated objective (see WAC [197-11-060\(3\)](#)). Alternatives including the proposed action should be analyzed at a roughly comparable level of detail, sufficient to evaluate their comparative merits (this does not require devoting the same number of pages in an EIS to each alternative).

(3) If the nonproject proposal concerns a specific geographic area, site specific analyses are not required, but may be included for areas of specific concern. The EIS should identify subsequent actions that would be undertaken by other agencies as a result of the nonproject proposal, such as transportation and utility systems.

(4) The EIS's discussion of alternatives for a comprehensive plan, community plan, or other areawide zoning or for shoreline or land use plans shall be limited to a general discussion of the impacts of alternate proposals for policies contained in such plans, for land use or shoreline designations, and for implementation measures. The lead agency is not required under SEPA to examine all conceivable policies, designations, or implementation measures but should cover a range of such topics. The EIS content may be limited to a discussion of alternatives which have been formally proposed or which are, while not formally proposed, reasonably related to the proposed action.

In this case, the County will utilize the analyses, findings, and conclusions developed during the preparation of the Subarea Plan as the basis for the DEIS, except where more recent information is readily available. Overall, the level of detail in the DEIS will not be at the site- or project-specific scale. Since adoption of the Subarea Plan including economic-development urban growth areas will involve goals and policies intended to address the anticipated impacts of urban development, the Draft Plan and EIS will be considered together as companion documents that identify mitigation measures such as development standards, design guidelines, and infrastructure improvements to be implemented following adoption of the plan. Most specific environmental impact assessment and necessary mitigation will then be

addressed at the project permitting level. This is phased review under SEPA. *"Phased review" means the coverage of general matters in broader environmental documents, with subsequent narrower documents concentrating solely on the issues specific to the later analysis (WAC [197-11-060\(5\)](#)). Phased review may be used for a single proposal or EIS (WAC [197-11-060](#)).*

The DEIS will also rely on other related environmental review documentation including the 2002 Lewis County Comprehensive Plan EIS and more recent analyses of the South County planning area.

The DEIS will address the environmental elements shown below, but will not include all of the "sub-elements" since detailed information on some of them is not available.

- (1) *Natural environment*
 - a. *Earth*
 - b. *Water*
 - c. *Plants and animals*
 - d. *Energy and natural resources*
- (2) *Built environment*
 - a. *Environmental health*
 - b. *Land and shoreline use*
 - c. *Transportation*
 - d. *Public services and utilities*

Alternatives

As noted in WAC 197-11-442, the primary purpose of a nonproject EIS is to compare the relative impacts of the alternatives that have been suggested. This includes the No-Action Alternative (continuation of the area under current zoning); the South Lewis County Steering Committee Alternative (or Committee Alternative); and an alternative that includes other land use options that were considered by the Committee during the planning process and dismissed. The Lewis County Planning Commission will hold a public hearing on the Draft Plan and DEIS and then recommend a Preferred Alternative that may be the same as, or a variation of, the alternatives examined in the DEIS. The Preferred Alternative may be subjected to further environmental review in the Final EIS (FEIS). The Commission's recommendation, together with the FEIS, will then be forwarded to the Board of County Commissioners who will hold another public hearing prior to taking action.

The essential purpose of the EIS is to identify "significant adverse" environmental impacts of growth. South County will continue to grow under all of the alternatives. The difference is in the nature and extent of growth; whether there are identifiable thresholds where either the amount or concentration of growth will create significant adverse impacts; whether those impacts can be mitigated; and if not, whether the cumulative unmitigated impacts would undermine the validity of the plan and associated policies and regulations.

The Committee Alternative proposes the following:

- Designation of new economic (non-residential) urban growth areas;
- Designation of an “urban reserve area;”
- Adoption of new land use and zoning designations for industrial, mixed retail/commercial, and tourist-oriented uses;
- An environmental protection density transfer method;
- Strategies for infrastructure capital facilities improvements

The Draft Subarea Plan also includes a proposed expansion of the City of Toledo UGA. The City of Toledo participated in the planning process and framed its proposal in conjunction with the Committee’s assistance in order to be consistent with the overall analysis. Although the analysis of the proposed expansion of the Toledo UGA is separate from the Committee Alternative, the economic development UGA and Toledo’s proposed UGA expansion must be considered together to ensure consistency.

This DEIS evaluates the relative environmental impacts of the Committee Alternative, the No-Action Alternative, and other alternatives that were considered. These alternatives are described more fully and evaluated in the Environmental Analysis section of this document. Table 1 summarizes the results of the analysis for each of the alternatives.

Organization of this document

The following environmental review discloses the range of environmental impacts of the alternatives and their associated mitigating measures. Rather than contain an “existing conditions” description for the environmental elements, that information is included in the Draft Subarea Plan where more detailed descriptions of the alternatives are provided. In each of the segments of the table, the related section of the Draft Plan is indicated. Following the table, a more detailed description of the alternatives, impacts, and mitigating measures is presented, ending with conclusions.

Table 1: Comparison of Alternatives
SOUTH COUNTY SUBAREA PLAN

1- NO ACTION ALTERNATIVE	2-COMMITTEE ALTERNATIVE	3-ALTERNATIVES CONSIDERED AND REJECTED IN THE PLANNING PROCESS	4-TOLEDO ALTERNATIVE
Continued designation of the area outside of the existing UGAs for rural and resource uses current zoning.	Designation of ~ 810 gross acres as economic development UGAs with associated comprehensive plan policies and development standards, including provisions for protecting environmental features. Designation of ~ 430 gross acres as Urban Reserve.	Designation of various areas as economic development UGAs including areas in the I-5 corridor, adjacent to Lewis & Clark State Park, adjacent to the Toledo Airport and adjacent to the current cities' UGAs..	Designation of a~ 160 gross acre UGA expansion area for the City to support residential growth and supporting land needs.
NATURAL ENVIRONMENT			
Earth			
The No-Action Alternative would result in continued rural development involving the clearing of sites for, and construction of, homes and non-residential uses. Impacts of development would be addressed through rural development standards for clearing, grading, erosion control, and foundation design.	Under this alternative, site development would be regulated by urban development standards. The percentage of individual site coverage would be greater than under Alternative 1, thus involving more intensive clearing and grading. Larger buildings in mixed use and commercial areas would involve deeper excavations and foundations.	Similar to Alternative 2 - higher levels of clearing and grading would be necessary.	Similar to Alternative 2.
<u>Mitigating Measures</u> In all cases, adopted rural, or urban development standards should address potential project-level impacts to the earth. As density increases, the rigor of the regulations would have to be more detailed to address the scale and intensity of larger structures on smaller, more constrained sites.			

1- NO ACTION ALTERNATIVE	2-COMMITTEE ALTERNATIVE	3-ALTERNATIVES CONSIDERED AND REJECTED IN THE PLANNING PROCESS	4-TOLEDO ALTERNATIVE
Air			
Low density development would continue to require private vehicles as the primary mode of transportation, which could exacerbate air quality at intersections where idling vehicles may stop and as a result of the need to commute outside the subarea for employment, goods and services.	As the concentrated employment centers are developed, and alternatives to single-occupant vehicle commuting are feasible congestion could diminish. In addition, employment in closer proximity to the population centers could offset emission levels created by longer commutes.	Similar to Alternative 2	Similar to Alternative 2
<u>Mitigation Measures</u> Continued improvements to auto emission standards and controls on home heating systems should mitigate increased air quality impacts of development under all alternatives.			

1- NO ACTION ALTERNATIVE	2-COMMITTEE ALTERNATIVE	3-ALTERNATIVES CONSIDERED AND REJECTED IN THE PLANNING PROCESS	4-TOLEDO ALTERNATIVE
Water			
<p>Small scale scattered impervious surfaces and site-specific surface water stormwater management facilities would continue to be dispersed throughout the existing South County rural area. While some existing failing or at-issue drainage systems would involve improvements, the current level of regulation and public improvements would remain at a rural level of service. This could lead to incidental run-off problems and less potential for managed groundwater recharge. The continued dispersed pattern of development could lead to more individual wells and small water systems, and the use of on-site septic systems which could lead to potential ground and surface water contamination.</p>	<p>The primary impacts of urban level economic development would be increased runoff and less potential for groundwater recharge, although sewer and stormwater infrastructure systems provide opportunities for other directed forms of groundwater recharge. A more concentrated pattern of growth served by urban water systems would lessen the impact on the aquifer throughout the surrounding area. Additionally, compact growth using public sewer service would lessen the potential for groundwater contamination.</p>	<p>Demand for potable water would increase commensurate with the increased development capacity. Stormwater detention facilities would have to be designed to accommodate higher levels of runoff and water quality facilities would have to be designed to accommodate increased pollutants from impervious surfaces.</p>	<p>Similar to Alternative 2.</p>
<p><u><i>Mitigation Measures for Proposals</i></u></p> <p>In all cases, public water supplies would have to be capable of handling the anticipated levels of growth under the alternatives. This includes water for domestic uses, irrigation, and fire flows. The State Department of Ecology is reviewing <u><i>Chapter 173-526 WAC Water Resources Management Program for the Cowlitz Basin, WRIA26</i></u> that establishes the amounts and procedures for allocating future water rights from instream flows of the Lower Cowlitz River. Stormwater management requirements would be as directed by the Lewis County Code, Chapter 15.45 including Best Management Practices detailed in the applications, reviews, and approvals of project-level plans.</p>			

1- NO ACTION ALTERNATIVE	2-COMMITTEE ALTERNATIVE	3-ALTERNATIVES CONSIDERED AND REJECTED IN THE PLANNING PROCESS	4-TOLEDO ALTERNATIVE
Plants & Animals			
Wildlife habitat would be disturbed due to rural development and resource extractions, subject to the provisions of the critical area regulations. Vegetation would be removed as part of site clearing and grading. Wildlife corridors, which serve as habitat and migration routes, may be severed. Streams and supported aquatic life would be affected by increased stormwater runoff due to development and land clearing.	Similar to Alternative 1. The proposed urban economic development UGAs would be designated to avoid the priority habitats in the Subarea. Within the new UGAs, existing habitats would be addressed in site-specific proposals that would be intended to increase opportunities for habitat restoration and management either on-site, or on selected sites in the rural area.	Similar to Alternative 2. There would be more impact on prime habitats, as some of the proposed UGAs overlap areas identified for protection.	Similar to Alternative 1
<p><u><i>Mitigation Measures for Proposals</i></u></p> <p>The critical area regulations would be used along with other measures such as sale or transfer of development rights to address habitat protection, mitigation, and restoration in urban areas. Site specific plans would be required to include mitigating measures and commitment to protecting other major habitats in the rural area.</p>			

1- NO ACTION ALTERNATIVE	2-COMMITTEE ALTERNATIVE	3-ALTERNATIVES CONSIDERED AND REJECTED IN THE PLANNING PROCESS	4-TOLEDO ALTERNATIVE
Energy & Natural Resources			
Single family residential development is expected to continue as the main form of housing in the rural area. The low density spacing of development would result in less efficient use of energy, including the distribution of heating fuels. Additionally, the use of automobiles and increased trip length would result in higher fuel consumption. This alternative is likely to have a greater impact than the other alternatives. Mineral resource, forestry and agriculture lands would continue to be protected under existing county regulations.	The denser urban configuration would result in a more efficient system of distribution for energy and heating fuel (such as natural gas) that could become available. Mineral resource, forestry and agriculture lands would also continue to be protected under existing county regulations. With more opportunity for ride-sharing and transit, and less commuting to other employment centers outside of South County, the use of automobiles would possibly decline resulting in less fuel consumption.	Similar to Alternative 2.	Expansion of the UGA would enable development of higher density housing than permitted under rural zoning.
<u>Mitigation Measures for Proposals</u> Building code standards encouraging more energy efficient construction and “low impact development” could be adopted. Public works design standards could be enhanced to promote a higher level of design and construction.			

1- NO ACTION ALTERNATIVE	2-COMMITTEE ALTERNATIVE	3-ALTERNATIVES CONSIDERED AND REJECTED IN THE PLANNING PROCESS	4-TOLEDO ALTERNATIVE
BUILT ENVIRONMENT			
Environmental Health			
Current levels of noise, air, and water pollution or risks would continue. Impacts of new development would be addressed by current adopted rural development standards.	Noise and air pollution could increase incrementally in the more intensive urban areas with a possibility of a decrease in the adjacent rural areas if development pressures for non-residential uses there lessen. Light pollution would also increase in the urbanized area. The economic development UGAs would increase opportunities for the management and restoration of environmentally healthy resources as a function of the increased need to mitigate concentrated urban development.	Similar to Alternative 2.	Similar to Alternative 2
<p><u><i>Mitigation Measures for Proposals</i></u></p> <p>Development would be required to meet adopted County development standards in all cases. The designation of recommended priority habitat areas and major hydrological features would bring attention to environmental mitigation of conditions impacting water quality. The economic development UGAs would require a higher level of development standards to be imposed as part of project-specific applications, reviews, and approvals.</p>			

1- NO ACTION ALTERNATIVE	2-COMMITTEE ALTERNATIVE	3-ALTERNATIVES CONSIDERED AND REJECTED IN THE PLANNING PROCESS	4-TOLEDO ALTERNATIVE
Land And Shoreline Use			
The current land use regulations in place for Lewis County would remain in force. Therefore, all development patterns would continue to follow current trends. Open space would diminish as more parcels are converted to residential uses. This alternative would change South County's rural character slowly over time.	Specific urban zoning provisions and design guidelines would be developed for South County economic development UGAs. This would enable South County to maintain its rural character while providing opportunities for creating jobs, increasing revenues, and enhancing public services. Protection and enhancement of priority habitats and hydrological features could be accomplished through the sale or transfer of development rights, rural clustering, and environmental mitigation.	Similar to Alternative 2.	Similar to Alternative 2, except that an increased residential population would stimulate a higher level of public and private services and amenities.
<i>Rural Areas</i>			
See above.	Demand for residential sites in rural areas in close proximity to the economic development UGAs could increase as the market responds to the increased desirability of living closer to employment.	Similar to Alternative 2	

1- NO ACTION ALTERNATIVE	2-COMMITTEE ALTERNATIVE	3-ALTERNATIVES CONSIDERED AND REJECTED IN THE PLANNING PROCESS	4-TOLEDO ALTERNATIVE
<i>Infill Development</i>			
Infill in the rural area would be limited by required densities, and site areas necessary to accommodate on-site septic systems, and stormwater management facilities.	Infill in the cities could be stimulated with increased utility capacity and increased residential population growth resulting from job growth.	Similar to Alternative 2	Similar to Alternative 2
<i>Urban Growth Areas</i>			
The burden of accommodating future urban growth would fall on the cities' capabilities to provide urban level services.	The proposed economic development UGAs would create new capacity for accommodating businesses in Lewis County that would otherwise locate elsewhere.	Similar to Alternative 2	Expansion of the Toledo UGA would enable the City to meet its residential population growth target for 2030 along with other related land needs for non-residential uses.
<i>Population and Housing</i>			
Growth would continue to be dispersed in rural areas, using large lots and creating dispersed demand for schools and other public services.	Location of new economic development enterprises would increase the demand for housing which would affect residential growth in the cities and the rural area.	Similar to Alternative 2	See above.

1- NO ACTION ALTERNATIVE	2-COMMITTEE ALTERNATIVE	3-ALTERNATIVES CONSIDERED AND REJECTED IN THE PLANNING PROCESS	4-TOLEDO ALTERNATIVE
<i>Protection of Environment & Critical Areas</i>			
Adopted critical areas regulations, stormwater management standards, and other codes would continue to provide protection of sensitive areas.	Existing regulations and standards would be tailored to fit specific economic development UGA projects as part of the application, review, and approval process. Development intensity credits would be used to protect and conserve rural and resource lands.	Similar to Alternative 2, although a higher level of mitigation standard would be necessary to address impacts on critical areas, habitat, and hydrological features.	The County and City would prepare development standards and regulations specific to the UGA expansion area.
<i>Open Space</i>			
Current policies and rural/resource regulations will continue to prevail.	Regulations and development standards could be adjusted to acknowledge the different conditions associated with urban development. Project-level planning and design would include provisions for buffers, project open spaces, and development rights transfers to protect open space character of rural lands.	Similar to Alternative 2	See above

1- NO ACTION ALTERNATIVE	2-COMMITTEE ALTERNATIVE	3-ALTERNATIVES CONSIDERED AND REJECTED IN THE PLANNING PROCESS	4-TOLEDO ALTERNATIVE
<i>Community Identity</i>			
Community identity (“rural lifestyle”) may change as continued subdivision and development of rural properties under existing zoning occurs.	Infusion of new employment activity in the proposed economic development UGAs will increase traffic and create a different aesthetic around them which may be disconcerting. Potential development rights transfers to the UGAs could reduce pressure on rural subdivision and development.	Similar to Alternative 2	Similar to Alternative 2 for the immediate area around Toledo.
<u><i>Mitigation Measures for Proposals</i></u> Impacts associated with Alternative 1 will be mitigated through application of current adopted County policies, regulations, and capital facilities plans, programs, and projects. Impacts of the other alternatives would be addressed through new policies, regulations, and programs adopted to implement the selected alternative.			

1- NO ACTION ALTERNATIVE	2-COMMITTEE ALTERNATIVE	3-ALTERNATIVES CONSIDERED AND REJECTED IN THE PLANNING PROCESS	4-TOLEDO ALTERNATIVE
Transportation			
<p>The rural development pattern would exacerbate the County's ability to maintain transportation facility concurrency, that is, to improve transportation facilities prior to or concurrent with development. Due to the inability to anticipate the nature and location of rural development, the road network could be subject to increased congestion, traffic hazards and increase the potential for accidents. Single occupant vehicle travel would remain the primary source for travel due to the irregular development, making alternative transportation such as transit and ride sharing difficult to implement due to the low density.</p>	<p>The economic development UGAs would be served by a network of county arterials, state highways and I-5 based on anticipated improvements concurrent with development. Single occupant vehicle travel would still remain the primary source for travel in rural areas; however the denser urban development would be more likely to support alternative transportation modes. Trails and sidewalks for pedestrians and bicyclists would be required as part of new development within the UGAs.</p>	<p>Similar to Alternative 2. Greater population density and development intensity would support increased transportation system improvements through public investment and private project mitigation.</p>	<p>Similar to Alternative 2</p>
<p><u>Mitigation Measures</u></p> <p>Impacts associated with Alternative 1 will be mitigated through application of current adopted County policies, regulations, and capital facilities plans, programs, and projects. Impacts of the other alternatives would be addressed through new policies, regulations, and programs adopted to implement the selected alternative.</p>			

1- NO ACTION ALTERNATIVE	2-COMMITTEE ALTERNATIVE	3-ALTERNATIVES CONSIDERED AND REJECTED IN THE PLANNING PROCESS	4-TOLEDO ALTERNATIVE
Public Services and Facilities			
Demand for public services will increase with growth. This includes demand for emergency, public safety, education, and recreation services. Levels of service would continue to be at rural standards. The dispersed population would be more difficult to serve. Rural development increases the risk of loss due to fire, when necessary fire flow due to inadequate wells or small privately owned water systems are unable to provide adequate fire suppression. Larger, more dispersed service areas create greater response times for emergency and police services. Provision of schools, and recreation services would be limited by the dispersed development character.	Demand for public services will increase with growth. The concentrated development in the economic development UGAs will require urban-level utility, public safety and emergency services. Job growth is expected to fuel increased demand for housing which will trigger demand for more schools and recreational services and facilities. Local increases in tax revenues will support financing for capital facilities in the cities and county.	Similar to Alternative 2	Similar to Alternative 2 for Toledo.
<u>Mitigation Measures</u> Under Alternative 1, the provision of public facilities and services would continue to be at rural levels of service. Under the other alternatives, implementation of urban levels of service would require increased public and private investment as growth occurs and associated revenues increase.			

II. ALTERNATIVES

Introduction

The alternatives subject to SEPA review include the No-Action Alternative and three alternatives for additional Urban Growth Areas (UGAs) in South County. The primary difference between the alternatives is the location and development potential of the UGAs. The No-Action Alternative assumes that South County will remain a rural/resource area with three cities as urban growth areas and large lot rural subdivision and development outside the cities. Two of the UGA alternatives would direct new economic development growth to specific economic-development UGAs designated for industrial, commercial, and tourism-related uses. The Toledo Alternative is specific to a proposed expansion of the UGA to accommodate the City's allocated population growth. Although coordinated with the Subarea Plan, the Toledo Alternative is a "stand-alone" proposal in that it will be adopted, amended or rejected independently of the other three alternatives.

Since all alternatives would allow continued growth in South County, they all will create unavoidable impacts including:

- An increase in air and water pollution, possible degradation of air and water quality.
- A decrease in groundwater recharge due to increase in impervious surfaces.
- Increased demand on potable water, sewage facilities, and other public services.
- Loss of habitat.
- Continued demand on natural resources, including water and power sources.
- Increased demand on recreation services and facilities.
- Continued demand for housing.
- Conversion of some of the rural landscape to new urban character, affecting the aesthetic quality.
- Increase in traffic and demand on transportation facilities.

These environmental concerns will remain regardless of where growth occurs. Managing growth and where it occurs is one way of managing how severe these impacts are in any particular area.

The following section of the EIS, "Affected Environment, Environmental Impacts, and Mitigating Measures," describes the comparative results of environmental impacts of the alternatives. Some important factors help to set the context for that discussion.

- 1) Most of the subarea is, and will remain, rural and resource land.
- 2) The Cities of Toledo, Winlock, and Vader, with their associated UGAs, and the Cardinal Glass UGA are the current designated urban areas within the Subarea.
- 3) The theoretical residential build-out capacity of the existing rural and resource lands within the subarea is 9,375 residences (24,375 population) based on current zoning.
- 4) The 2030 population allocation to the three cities is 6,566 persons.
- 5) The Subarea Plan does not anticipate the creation of new urban areas for residential growth except for the proposed Toledo UGA expansion.

III. AFFECTED ENVIRONMENT, ENVIRONMENTAL IMPACTS, AND MITIGATING MEASURES

Affected Environment

The South Lewis County Subarea comprises approximately 68,000 acres or about 106 square miles generally bounded by Avery Road and US 12 on the north, Howe Road/Blakely Lane on the east, the county line on the south, and the Winlock-Vader Road on the west. The Subarea contains the Cities of Vader, Toledo, and Winlock. Interstate 5 bisects the Subarea north-south, and SR 505 is the principal east-west arterial. Jackson Highway connects with SR 505 just north of Toledo and runs northward through Lewis and Clark State Park to US 12 and on to Chehalis. The BNSF/Amtrak railroad tracks run along the western edge of the Subarea through Winlock and Vader. The Lewis County Ed Carlson Memorial Airport is located several miles northeast of Toledo. The Cowlitz River cuts across the southern portion of the Subarea by Toledo and crosses the County line between I-5 and Vader.

Environmental Impacts and Mitigating Measures

Earth

In this environmental element, geology, soils, topography, unique physical features, and erosion and accretion are considered subject to impacts. While the actions of adopting the Subarea Plan land use designations and zoning would have no direct environmental impacts, those actions would create the framework for subsequent project-level actions which could have impacts. Since most of the Subarea is minimally developed, the nature and extent of impacts resulting from new rural development would generally be similar to those that have occurred from previous development.

All alternatives would result in site clearing, grading, excavation and filling, depending on the type of development, size of building, configuration of parking, landscaping and other related construction activities. There would be a risk of erosion, loss of topsoil, and disturbance of surficial geology in all instances. The relative risk potential on specific sites in Alternatives 2, 3, and 4 could be respectively greater than in Alternative 1, depending upon the magnitude of projects allowed under each.

Mitigating measures addressing these impacts are, or would be, provided by County construction and design standards applied during project permitting. These include temporary erosion and sedimentation controls, foundation design conditions, and critical area regulations for identified sites with geologically hazardous conditions. In portions of the Subarea that have been identified for priority hydrological protection, more rigorous land development standards would apply and incentives offered to encourage project proponents to purchase development rights for permanent protection from environmental impacts.

Air

This element addresses impacts to air quality, odor, and climate. As with impacts to the earth, the impacts to air would occur at the project level, either during construction, or as a function of the use, in the case of odors, or both. All alternatives would have the potential of impacts to the air occurring. The most likely cumulative impact would be to air quality resulting from

increased emissions from vehicles or heating systems. Generally, the risk of this is declining as new vehicles with improved emission controls replace older ones, and as federal, state, and local regulations enforce stronger controls on furnaces and other heating devices.

Mitigating measures include appropriate traffic controls at intersections limiting engine idling, enforcement of dust and emission controls on construction activities, and building code provisions regulating home heating systems.

Water

This element includes surface water quantity and quality, stormwater runoff, flooding, groundwater quantity and quality, and public water supplies. Considerable concern has been raised in the community regarding this, particularly with respect to water quality issues resulting from development-induced impacts on surface waters and priority hydrological areas.

The Grays-Elochoman and Cowlitz Watershed Management Plan and Lewis County's critical area regulations (17.35A LCC) and stormwater management regulations (15.45 LCC) provide a framework for addressing the impacts of development on the Subarea's hydrological features including streams, wetlands, and aquifers. This includes best management practices and monitoring provisions for assessing the effectiveness of mitigation measures including wetland mitigation banking.

The Cities currently operate sanitary sewer systems and have adopted agency-approved functional plans for their systems. Lewis County, the Cities of Winlock, Toledo and Vader, and Cowlitz Indian Tribal Housing (CITH) are discussing the creation of a regional utility that could consolidate the planning and operation of water and sewer utilities and provide services to the proposed new economic development UGAs described in the Subarea Plan.

Under all alternatives, new development will create increased amounts of impervious surfaces (roofs, parking lots, patios, etc.). This will generate the need for better management of stormwater run-off. In addition, new development will require the installation of more on-site septic systems in the rural area, while new development in the UGAs will be served by sanitary sewer systems. Existing development in urban areas may be allowed to continue to use existing septic systems if they are performing adequately, but eventually it is anticipated that all properties will be connected to the sewer system.

Plants and Animals

The components of this element are habitats, unique species, and fish and wildlife migration routes. Within the Subarea, the Washington State Department of Fish and Wildlife has mapped the priority habitat area, generally following the Lacamas Creek drainage. Rural or urban development in that area should be minimized, or offsetting provisions for mitigation should be included in any project approval. Sale or transfer of development rights may be used to limit development by paying property owners to not develop. Purchase and dedication of conservation areas as a result of implementing development incentives in the UGAs will also protect habitat areas.

Energy and Natural Resources

Development will continue under all alternatives. Most will likely be in the form of single family residential uses. Under Alternative 1, the more dispersed rural pattern of growth would likely result in less efficient delivery of energy, including heating fuels. Under the UGA alternatives, the denser urban development pattern would be more supportive of economical energy distribution systems. Electrical energy will continue to be provided throughout the area consistent with demand.

Mitigation will be provided by increased energy conservation measures required in the development and building code.

Environmental Health

This element includes noise, risk of explosion, and releases of toxic or hazardous materials that affect public health. Under all alternatives, noise pollution during construction and cumulative increases in traffic noise will be the likely outcome of development. The relative densities and proximities of noise receptors such as homes will result in proportional increases of sensitivity to noise.

Mitigating measures will depend upon the current adopted noise standards and potentially more rigid standards on development in the UGAs. Specific mitigation measures will be addressed when noise receptors and noise generators are identified during project review.

Land and Shoreline Use

This element addresses relationships to existing plans and population, housing, light and glare, aesthetics, recreation, historic and cultural preservation, and resource extraction.

Existing Plans and population – Lewis County is currently in the process of amending the Comprehensive Plan and the Countywide Planning Policies to provide a basis for adopting subarea plans. Under the GMA, subarea plans are intended to “clarify, supplement, or implement jurisdiction-wide comprehensive plan policies, and may only be adopted if the cumulative impacts of the proposed plan are addressed by appropriate environmental review under chapter 43.21C RCW; the development of an initial subarea plan for economic development located outside of the one hundred year floodplain in a county that has completed a state-funded pilot project that is based on watershed characterization and local habitat assessment.” The South Lewis County Subarea planning process has engaged the cities and other stakeholders in a 2-year process to formulate the plan assessed here. Upon adoption of the framework policy amendments, the Board of County Commissioners is expected to adopt the Subarea Plan.

Housing – All alternatives would see the development of new housing and possible loss of existing housing. There would be a net increase in the total housing count. Provision for, or encouragement of, affordable housing would come from current adopted policies, regulations and strategies of the County and Cities’ Comprehensive Plans and development regulations in the case of Alternative 1. Additional housing policies are included in the Subarea Plan, primarily pointing towards future changes to the Cities’ policies and regulations.

Light and Glare – New development under all alternatives could create light and glare impacts. This would include exterior lighting on residential properties and parking lot and building

lighting in industrial and commercial areas. New streets would be lit as required by County public works standards. The affect of increased lighting would be to diminish the contrast and visibility of the night sky. Increased glare would be a function of additional reflective building materials and windows reflecting sunlight.

Aesthetics – The visual environment will be affected by new development under all alternatives. Under Alternative 1, this trend will be less apparent than under the UGA alternatives which would result in a significantly more urban character at the individual UGA locations.

Historic and Cultural Preservation – There are several designated historic places or known cultural places in the area. These, and any undiscovered archeological and cultural resources would be protected through city and county measures.

Agriculture – Lewis County adopted land use designations and policies for “Agricultural Lands of Long-Term Commercial Significance” (ARL) in 2009. The South Lewis County subarea contains approximately 16,500 acres of land so designated. Some of these lands are being, or have been, farmed. The rest of the Subarea outside of the current UGAs is designated “Rural” and “Forest Lands of Long-Term Commercial Significance” (FRL). Some of these lands are also being farmed. Alternative 1 would not change this condition. Other County actions could re-designate some of these lands through Comprehensive Plan updates. Alternatives 2 and 3 would result in the creation of economic development UGAs generally surrounded by ARLs or Rural lands. Part of the proposed Toledo UGA expansion (Alternative 4) would also be partially bordered by ARLs and Rural lands.

Mitigating measures for impacts on adjacent rural or resource lands associated with land uses and development of UGAs include current adopted policies, regulations (Right to Farm), and development standards. Site specific mitigating measures, such as buffers and screening, can be required as part of project application, review, and approval processes. The Subarea Plan includes recommended goals and policies that would supplement the existing regulatory framework for addressing the impacts likely to occur as more urban-scale development is proposed. The proposed goals and policies include:

- Site design standards for parking, building placement and circulation;
- Open space, and landscaping;
- Critical area protection; and
- Energy conservation strategies.

Transportation

This element covers transportation systems including motor vehicles, rail and air, movement/circulation of people or goods, and traffic hazards. The current system of county roads and state highways, and I-5 are oriented to vehicular mobility. Provisions for pedestrians, bicycles, and transit are understandably limited due to the current rural development pattern. The Subarea Transportation Plan has identified capacity and concurrency issues and solutions with respect to both existing and forecasted future transportation problems. Under all alternatives, the transportation system including non-motorized modes would be impacted by

new growth. This would require progressive monitoring and assessment of how facilities meet level of service standards and when new capacity or other solutions must be implemented.

Under Alternative 1, the continuation of the characteristic rural growth in and around South County would strain the County's ability to maintain transportation facilities and plan for improvements. Improvements would likely be the result of a reaction to impacts of growth since development could occur anywhere subject to land availability and on-site septic feasibility. Due to the inability to plan before growth, rural roads and intersections could experience increased congestion as demand occurs incrementally. This could result in an increase in traffic safety problems. Single occupant vehicle travel would remain the primary source for travel due to the low density rural development pattern, making alternative transportation, such as transit and vanpools, difficult to implement.

Under the economic development UGA alternatives, development within South County would require a more rigorous application of transportation facility planning and implementation of improvements to maintain proper urban levels of service standards. Private developers would be required to work closely with the County to ensure that appropriate traffic mitigation, on-site parking, and pedestrian safety improvements would be in place to support projects. These alternatives also will lead eventually to planning for non-motorized transportation and public transit and to anticipate future improvements that address congestion and traffic hazards.

Single occupant vehicle travel would still remain the primary source for travel in rural areas, however the level of development within the UGAs would eventually lead to the economic feasibility of ride-sharing or transit.

Mitigating measures for transportation impacts associated with land use and development include current adopted policies, regulations, and standards for continued growth per the No-Action Alternative 1. As part of its regular comprehensive plan transportation capital facilities planning and development code update processes, the County could amend the existing framework to address impacts more rigorously than it currently does. If the economic-development UGAs are created, the recommended goals, policies and development regulations in the Subarea Plan would create a new regulatory framework based on urban standards. The recommended strategies include increased coordination with Washington State Department of Transportation (WSDOT) related to joint transportation planning; coordination with the Lewis County Comprehensive Plan Transportation Element; preparation of a South County non-motorized transportation plan; and possible implementation of an impact fee system.

Public Services and Utilities

This element includes fire and police protection, schools, parks and recreation, maintenance, communications, and water, sewer and solid waste services. Demand for public services will increase with growth under all alternatives. The degree of demand and supply of these services would vary from that typical of the current rural development pattern to a higher level within the proposed UGAs. Rural dispersed populations make it difficult to provide such services efficiently. Under the No-Action Alternative, dispersed development would result in greater response times for emergency and police service. Expansion of schools and recreational

opportunities would also be needed to provide for a growing population, but the number and size of these facilities be based on a rural level of service standard.

Under the economic development UGA alternatives, shorter response times for emergency services, increased demand for utilities, recreation facilities, and other public services would occur requiring further public or private capital investment in facilities. The cost of facilities and services would increase proportionate to the size of the service area population. Provision of sanitary sewer and water service would have to be phased so that adequate collection and treatment facilities were on line prior to or concurrent with growth. Other (private) utilities such as electrical power and telecommunications would also be phased by the providers.

IV. ANALYSIS OF ALTERNATIVES

Alternative 1

The No-Action Alternative would lead to growth impacts on the provision of rural services, utilities, and transportation, as development occurs over a larger, low density rural landscape. Increased land consumption for residential uses would result from further large-lot subdivisions. Changes in farming and forestry activities would occur as a result of economic conditions affecting those industries. Current water quality issues in South County would take longer to resolve, since the cost of solutions would be more difficult to support. Planning under this alternative would continue to be reactive to current and historical development trends.

Alternative 2

The Committee Alternative would allow for proactive planning for more dense development within the South County economic development UGAs. Public services, utilities, and transportation would become more efficient in those locations. The costs of the services will still be relatively expensive due to the dispersion of the proposed UGAs. Environmental effects such as traffic congestion and safety, air quality, noise and stormwater runoff would be greater within the UGAs due to the concentration of development. County-wide impacts could be less than in Alternative 1 as denser development relieves some pressure on the demand for rural lands.

Alternative 3

This combines the first 2 iterations of alternative UGA location concepts that were considered and rejected by the Steering Committee. Both would offer additional land area for economic development, although the likely on- and off-site mitigation requirements for impacts to critical areas, transportation, and other infrastructure could inhibit the attractiveness of some areas to development interests and the financial community.

Alternative 4

This alternative involves the proposed expansion of the Toledo UGA that has been formulated by the City during Subarea planning. The City's proposal is driven by the obligation to accommodate the 2030 population allocation to Toledo resulting from the countywide planning policy process as directed by the GMA. While this alternative is not directly comparable to the overall Subarea alternatives, it is related to them and is dependent upon the analysis that was conducted during Subarea planning. As such, it will be considered by the Lewis County Planned

Growth Committee, the Lewis County Planning Commission, and the Board of County Commissioners during the evaluation of the proposed Subarea Plan due to the cumulative impacts associated with the Subarea Plan adoption.

Specific Land Use Options Considered During Subarea Planning

The South Lewis County Subarea Steering Committee considered three iterations of alternatives for locating of economic development UGAs. In 2009, 13 potential locations were identified based on the market demand analysis and the development suitability criteria used to guide the location considerations. Later, in 2009, the County adopted the zoning for ARLs and the hydrological and habitat studies of the state agencies were completed. As a result, some of the potential UGA locations were compromised by the overlays of resource and environmental constraints. In April of 2010, a second iteration was considered which attempted to avoid the constraints and respond to comments by the Committee. That iteration showed 11 potential locations. Through the Committee's review of this iteration, it became necessary to conduct a more focused assessment of the development suitability of the potential locations, taking into account the presence of critical areas, existing development, parcel size and ownership characteristics. That analysis produced the June 2010 land use concept which became the Committee Alternative (#2). This alternative includes two proposed economic development UGAs, a proposed urban reserve area, and the City of Toledo's proposed UGA expansion.

V. CONCLUSIONS

Alternative 2 was developed by the South Lewis County Subarea Steering Committee to maintain the desired character of South County and the surrounding environment while accommodating future growth. This alternative allows for development of portions of the Subarea at urban intensity levels necessary to provide for future industry, commercial, and tourism-related demands. Drainage and sewer system plans will be developed consistent with the Subarea plan. These will provide the legal and financial basis for implementing water, sewer and storm water management systems for the UGA areas based on assumptions gained from this plan. Specific impacts to the area must be addressed at a later date for each of the functional plans due to the anticipated phasing of the systems and implementation responsibilities of the service providers. This leaves the possibility of impacts and mitigation not known at this time that may need to be addressed at the time of implementation.